

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

ANGELA GLODOWSKI, as the	)	
Representative of the Estate of AMANDA	)	
GLODOWSKI, Deceased, and as Next	)	
Friend of R.G., a minor,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 18-cv-151-bbc
	)	
DANIEL HEKMAN, M.D., et al.,	)	
	)	
Defendants.	)	

**PLAINTIFF’S UNOPPOSED MOTION FOR  
LEAVE TO FILE OVERSIZED BRIEF**

Now comes Plaintiff, Angela Glodowski, by and through her attorneys, Kathleen T. Zellner & Associates, and hereby respectfully moves for leave to file an oversized brief in response to the County Defendants’ motion for summary judgment. In support thereof, Plaintiff states as follows:

1. Plaintiff’s lawsuit stems from the death of Amanda Glodowski, who died by committing suicide at the Wood County Jail.
2. Plaintiff has alleged causes of action under § 1983 against Wood County, Sherriff Thomas Reichert in his official capacity, Officer Terry Johnson in his individual capacity, and Cassi Young in her official capacity (the “County Defendants”).
3. Plaintiff has also alleged a cause of action against Kristin Pagels, who was not an employee of the county at the time of Amanda’s death.

4. All Defendants have filed motions for summary judgment. The County Defendants have filed a combined motion for summary judgment, and Defendant Pagels has filed a separate motion for summary judgment.

5. Plaintiff seeks leave to file an oversized brief of 10 additional pages to respond to the County Defendants' motion for summary judgment.

6. Plaintiff's causes of action against Defendants Johnson and Young allege deliberate indifference under the 14th Amendment and state-law negligence claims. Plaintiff's causes of action against the Defendant County and Defendant Reichert allege a *Monell* claim.

7. The individual claims and the *Monell* claim rely on distinct facts, involve distinct legal issues, and require completely different legal analysis, which in turn necessitates a longer brief.

8. Plaintiff therefore seeks leave to file a brief with 10 additional pages in response to the County Defendants' motion.

9. This motion is brought in good faith.

10. Plaintiff has communicated with counsel for the County Defendants who has indicated that he has no objection to the relief requested herein.

Wherefore, Plaintiff respectfully requests leave to file an oversized brief, not to exceed 40 total pages, in response to the County Defendants' motion for summary judgment.

Respectfully submitted,

Dated: January 24, 2020

/s/ Nicholas Curran  
Nicholas Curran  
Attorney for Plaintiff  
Kathleen T. Zellner & Associates, P.C.  
1901 Butterfield Road, Suite 650  
Downers Grove, Illinois 60515  
Phone: (630) 955-1212  
Email: [attorneys@zellnerlawoffices.com](mailto:attorneys@zellnerlawoffices.com)

**Proof of Service**

I hereby certify that on January 24, 2020, I electronically filed the foregoing **Plaintiff's Unopposed Motion for Leave to File Oversized Brief** with the Clerk of the Court for the United States District Court for the Western District of Wisconsin. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

/s/ Nicholas Curran  
Nicholas Curran  
Attorney for Plaintiff